Quesnel Timber Supply Area
Timber Supply Review

Summary of Public Input

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Quesnel Forest District
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This is a summary of the public input received on the Timber Supply Review in the Quesnel Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

Quesnel Timber Supply Area

Background

As part of the review of timber supply in the Quesnel Timber Supply Area (TSA), two opportunities were provided for public input. The first followed release of the Quesnel Timber Supply Area *Data Package* and *Information Report* in June 1999. The *Information Report* was a non-technical summary of the draft data and management assumptions that were to be applied in reviewing the timber supply for the Quesnel TSA. A 30-day review period, ending July 30,1999, was provided for the public to comment on these documents.

On February 15, 2001, as part of the scheduled Timber Supply Review and in response to the urgent beetle epidemic in the Quesnel TSA, the British Columbia Forest Service released the *Quesnel Timber Supply Area Analysis Report and Information for Urgent Allowable Annual Cut Increase.* The public was encouraged to review and comment on the accuracy of the information in this document and to provide additional information during the 21-day review period that ended March 8, 2001. Because of the urgent nature of the beetle epidemic, the usual 60-day public review period was shortened to 21 days.

This report summarizes the input received during both public review periods. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut (AAC) for the Quesnel TSA. The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Quesnel Forest District office.

Public Review Process and Response

Quesnel District staff actively solicited public input on the Timber Supply Review in the Quesnel TSA through the following actions:

- direct mail-out of about 70 copies of the *Information Report*, *Data Package* and *Analysis Report and Information for Urgent Allowable Annual Cut Increase* to local governments and MLAs, First Nations, licensees, forest workers, environmental groups, ranchers, consultants and interested individuals in the Quesnel TSA or adjacent timber supply areas.
- the *Data Package* and the *Analysis Report* were available at the district office in Quesnel and the regional office in Williams Lake.
- a meeting regarding the *Data Package* and the *Information Report* was held with representatives from the Quesnel TSA Major Licensees' Association (about 15 attendees).
- an open house was held at the district office in July 1999 following the release of the *Data Package* and *Information Report* (five attendees).
- a meeting was held with the Quesnel Chamber of Commerce on Feb. 8, 2001, to discuss the *Analysis Report* (40 attendees).
- the Timber Supply Review documents were discussed with the local MLA.
- copies of the documents were provided to the local media. Newspaper and radio interviews were given when the *Analysis Report* was released.
- newspaper advertisements were placed, advising of the availability of the documents for review by the public.

The Quesnel Forest District received three written submissions on the *Data Package* and nine submissions on the *Analysis Report* (see Appendix 1).

Quesnel Timber Supply Area

Public Input

In this section, public input on the information presented in the Timber Supply Review documents for the Quesnel TSA is summarized under the following headings:

- Data Package (and Information Report)
- Timber Supply Area Analysis Report and Information for Urgent AAC Increase
- Other comments

Data Package

Land Base Factors
The submission from the Quesnel TSA licensees raises a number of issues about the definition of the operable land base. Their points include the following:

- they question to what extent the Cariboo Chilcotin Land Use Plan (CCLUP) has been incorporated, particularly its definition of productive land base.
- they question whether it is the intent to update Environmentally Sensitive Areas and/or to increase use of terrain stability mapping.
- they question the reduction in area of problem forest types (PFTs).
- since a significant portion of existing deciduous-leading stands naturally convert to coniferous-leading stands, they say a deferral with an appropriate regeneration delay would be more appropriate, rather than exclusion of these stands.
- they express disagreement with the exclusion of various stands as being unmerchantable, saying harvesting performance in many of these stands can be demonstrated.
- with regard to low productivity sites, they say exclusions must be based on current performance not on modelling constraints.

Regeneration Delay
The licensees' submission questions the regeneration delay used, saying that although licensees may report a seven-year delay, in actuality it is often less than that. The licensees offer to work with district staff to arrive at more realistic numbers.

Forest Cover Constraints
The licensees' submission says the data packages in other TSAs have recognized the role of forests outside the timber harvesting land base in meeting cover requirements, and asks if this is the case in the Quesnel TSA.

The licensees also question the forest cover constraints in the Cariboo River Wildlife Management Area. They say a forest development plan has been completed and approved for this area and no such constraints were anticipated, nor were they contemplated in the original agreement signed in 1990.

Cultural Sites
The Lhoosk'uz Dene submission says the Traditional Use Study done in the Quesnel TSA was a pilot project and a more extensive and comprehensive study must be completed as soon as possible. Of the sites identified, this submission says seven sacred sites and 32 spiritual sites are of high concern and assurance is needed they will be protected, as well as the other traditional use and archaeological sites. The Lhoosk'uz Dene say if forest development is to occur, it is imperative that Archaeological Impact Assessments be done in cooperation with them.

Wildlife and Riparian Areas
The licensees ask for information on the proportion of arboreal vs. terrestrial lichen management prescriptions that will be modelled for western caribou. They also ask what boundaries are used for western caribou habitat areas.

The licensees ask whether the mapsheets used to determine riparian management areas were a representative sample of the TSA. They also question why a reduction is applied to the land base for Riparian Management Zones, saying licensees should have access to all the

volume from within these zones, to be managed over one rotation. The licenses say a different methodology (e.g., varying the number of passes or applying cover constraints) would better approximate current practice in these zones.

Blackwater LRUP
The licensees question the source of the statement that ten per cent of zone 1 is available for harvesting, and also ask for clarification of the status of the Local Resource Use Plan.

Biodiversity
The licensees question how Wildlife Tree Patches (WTPs) are modelled and express concern about double-counting. For example, they say unmerchantable areas already removed from the timber harvesting land base often serve as suitable WTPs and this could also be true for other constraints. This submission also asks why the statement is made that 95 per cent of WTPs are larger than two hectares.

The Lhoosk'uz Dene submission says the ongoing interruption in the process of succession, which began with fire suppression and continues with clearcutting, the use of biocides and lodgepole pine silviculture prescriptions, is a problem for biodiversity maintenance. This submission says diversity must include people, as they are part of the forest and the land.

Kluskus Supply Block
The licensees state agreement with the treatment of this supply block in a sensitivity analysis. They say the wording on page 6 of the *Information Report* is incorrect; rather than saying licensees are not proceeding with development, it would be more appropriate to say that attempts at harvesting have not been successful but that a cutting permit has been issued.

The Lhoosk'uz Dene submission refers to the 1996 *Rationale Statement* and the chief forester's recommendations regarding the Kluskus supply block. The First Nation says no harvesting has occurred and they are determined none will occur without their meaningful participation. The Lhoosk'uz Dene recommend the Kluskus harvest be partitioned.

Proposed Facilities
Reko Log Homes says they are building a facility to make laminated panels out of pine and birch, and furniture cut stock from birch. Reko notes the opportunity for a variety of aspen products for export, and hopes this wood will be made available.

Socio-economic Factors
The Lhoosk'uz Dene say the economic and social objectives of the Crown should be clearly and publicly stated, and they request further information. The First Nation says the Crown's objectives should include economic parity (between aboriginal and non-aboriginal communities); respect for traditional aboriginal economies and cultures; regional economic diversification; and, enhanced biodiversity.

The Lhoosk'uz Dene say the aboriginal economy needs to be respected, protected and enhanced, and this is partly achieved through the protection of diversity. This submission refers to the so-called Moose Study that assessed the value of income-in-kind and commodity items provided by the land. As well, the Lhoosk'uz Dene say aboriginal sustenance uses will impact timber supply but no allowances have been made to accommodate this.

Analysis Report and Information for Urgent AAC Increase

Land Base Factors
The submission from the Carrier Chilcotin Tribal Council says they don't agree it's not possible to assess whether the timber harvesting land base has been over- or under-estimated. The submission points to several factors that

suggest the land base has been overestimated, such as sacred and traditional use sites, the caribou strategy, riparian areas, ungulate ranges, etc.

A submission from Slocan Forest Products (SFP) says management of problem forest types (PFTs) should be considered in concert with any initiative to deal with the mountain pine beetle infestation. The company says they've been working on an initiative to assess harvest opportunities in PFTs and provide an outline of a proposal to increase the harvest in PFTs by about 100,000 cubic metres annually, from the current harvest level of 300,000 cubic metres. The company's rationale includes the following points:

- the increase would mitigate the effect of an AAC falldown in 20 years that may result from an accelerated harvest of pine beetle infestations;
- SFP has available and under-utilized mill capacity for small wood;
- SFP has demonstrated harvest performance in PFTs; and,
- the Timber Investments Strategy Committee's report indicated a potential three to five per cent gain in harvest could be achieved by increasing the PFT harvest.

An individual submission says the use of deciduous species needs research.

Timber Requirements

The tribal council submission urges the chief forester to not simply consider current mill capability or lumber production, as the future may be different. The tribal council says value-added wood does not have difficulty with the Softwood Lumber Agreement, and notes that two local businesses with a large market rely on naturally dry wood, which will be harder to access with an increase in harvesting green attack timber.

Socio-Economic Factors

The tribal council submission questions the revenue figures in the report, and asks what the costs and net benefits in cash terms would be from an increased harvest. The submission says increasing lumber exports to the U.S. will increase the likelihood of a countervail, noting their understanding that most of the wood from the Quesnel TSA goes to the U.S.

A submission from the District of Wells notes their heavy reliance on tourism and questions how tourism targets, included in the Cariboo Chilcotin Land Use Plan, are being met in the TSA and how they will be impacted by any changes to the AAC.

Other Comments

Most submissions commented on factors or issues other than those specifically covered by Timber Supply Review documents. These comments are summarized in this section.

Timber Supply Review Process

The Lhoosk'uz Dene submission says they assert aboriginal title to the area in question and the taking of resources from their land is a violation of title which they do not consent to. This submission says the Lhoosk'uz Dene do not have the capacity to properly consider the Timber Supply Review documents and require financial assistance to do so. The submission refers to the Delgamuukw decision and asks how aboriginal priority has been taken into account and how the provincial government and third parties intend to address the issue of compensation for infringement of title. References and selected reports pertaining to timber supply are provided.

The District of Wells notes they did not receive Timber Supply Review information directly and asks to be put on the mailing list. An individual submission requests an extension of the public review period, saying it's a travesty that such an important analysis should have such a hushed, short review period.

Allocation

An individual submission says small business

sales need to be increased to bring more small operators into business, noting that small patch beetle logging suits small business. This submission also says large corporations should not be allowed to back small operations' bids and an open timber auction is needed.

Harvest Levels

Three submissions express support for an AAC increase to salvage beetle-killed wood and bring the infestation to a manageable level. Their reasons include:

- it will increase employment and allow further diversification of employment to proceed;
- 60 per cent of the THLB is susceptible to mountain pine beetle attack and thus the future timber supply in the TSA is threatened; and,
- the current AAC has not been able to decrease the magnitude of the infestation.

The District of Wells expresses concern that an AAC increase would negatively affect tourism targets in their area and particularly within the Quesnel Highlands Special Resource Management zone.

The Carrier Chilcotin Tribal Council says the proposed increase is clearly unsustainable, noting it is 43 per cent higher that the previously estimated long-term harvest level that preceded the CCLUP and its subsequent plans and strategies. The tribal council says the increase will lead to an economic boom that will be difficult to scale back, noting that in Williams Lake the mountain pine beetle harvest hasn't been scaled back for over two decades.

The Quesnel Environmental Society says it disagrees with the proposed increase, offering the following reasons:

- it's a reaction not a solution to an ongoing problem that natural processes have historically taken care of;
- the falldown will come sooner;
- the TSA will become another producer of smaller and younger fibre; and,
- more jobs are not guaranteed, given increasing mechanization and more raw logs leaving to be processed elsewhere.

The TSA Licensees Association says the harvest level falldown after 20 years, shown in the mountain pine beetle harvest forecasts, can be mitigated through other opportunities such as reduced regeneration delay, genetically improved stock, juvenile spacing, fertilization, etc. The association says the analysis should reflect these cumulative potential uplifting factors, particularly the application of the results of the Old Growth Site Index study.

Appendix 1

Submissions received by the Quesnel Forest District

Submissions received on the Data Package

Forest industry

Quesnel TSA Major Licensees' Association (Weldwood of Canada, Tolko Industries, West Fraser Mills, Slocan Forest Products, C&C Wood Products)

Reko Industries Ltd.

First Nations

Lhoosk'uz Dene Government Administration

Submissions received on the Timber Supply Analysis Report

Forest industry

Quesnel TSA Major Licensees' Association (Weldwood of Canada, Tolko Industries, Slocan Forest Products, Canadian Forest Products, C&C Wood Products, West Fraser Mills)

Slocan Forest Products Ltd.

Local government

District of Wells, Mayor Hendrixson

First Nations

Carrier Chilcotin Tribal Council, Bert Groenenberg

Interest groups

Quesnel Environmental Society

North Cariboo Share Our Resources Society

General public

Three individual submissions